



**U.S. Department of Justice**

Bureau of Alcohol, Tobacco,  
Firearms and Explosives

*Philadelphia Field Division*

601 Walnut Street, Suite 1000E  
Philadelphia, PA 19106

[www.atf.gov](http://www.atf.gov)

May 9, 2022

JSD Supply  
1052 New Castle Road,  
Prospect, Pennsylvania 16052

Dear Mr. Vinroe:

This letter is in regard to the products sold by your company, JSD Supply, which are generally described on your website, [www.jsdsupply.com](http://www.jsdsupply.com), as "JSD 80% Lower Receivers, Jigs, and Gun Parts Kits." The Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) is aware that JSD Supply is selling and transferring all the components necessary to produce a fully functional firearm to a single customer in one or multiple transactions.

The Gun Control Act of 1968 ("GCA"), in relevant part, defines the term "firearm" as "any weapon...which will, is designed to, or may readily be converted to expel a projectile by the action of an explosive...[or]...the frame or receiver of any such weapon." 18 U.S.C. § 921(a)(3). ATF has held that kits which include all components necessary to produce a functional firearm, including the jig or template used to finish the unfinished frame or receiver, the slide assembly, and the necessary components to complete the frame or receiver are themselves properly classified as "firearms" under the GCA. Specifically, these kits are a weapon that may readily be converted to expel a projectile by the action of an explosive. These kits are, therefore, firearms under the GCA and have always been firearms pursuant to statute. This is and has been true notwithstanding the recently announced regulations and definitions under Final Rule 2021R-05F.

Accordingly, those engaged in the business of selling these complete kits, as your company does, are in fact engaged in the business of dealing firearms. Further, selling the necessary components to produce a functional firearm to the same person through multiple purchases or structured transactions at different times instead of a single sale is equivalent to selling the complete kit to the customer. That is, the complete set of component parts necessary to create a firearm need not be packaged or sold in a single container or a single transaction in order to be considered a firearm. These piecemeal sales circumvent the requirements of the GCA and are unlawful.

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JSD Supply

To lawfully engage in the business of dealing firearms, a person must first obtain a Federal Firearms License (FFL). 18 U.S.C. § 923(a). JSD Supply does not currently possess, nor was it ever issued, an FFL that would authorize JSD Supply to engage in the business of dealing firearms. Additionally, JSD Supply does not maintain records as required by the GCA, nor does it subject its customers to undergo an NICS background check, both of which actions are necessary for the lawful sale of firearms. Therefore, JSD Supply must take the following actions:

1. Cease and desist the sale of firearms without a license;
2. Cease and desist the sale of the full set of component parts necessary to produce or readily converted into a functioning firearm, whether in a single transaction or in multiple structured transactions;
3. Immediately and fully comply with and abide by all laws and regulations governing the sale of firearms, frames, and receivers.

For public safety reasons, your cooperation in this matter is essential.

For any questions, please contact Special Agent in Charge, Philadelphia Field Division, Matthew P. Varisco at 215- 446-7800.

Sincerely,

**MATTHEW  
VARISCO**

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MATTHEW VARISCO  
Date: 2022.05.10  
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Matthew P. Varisco  
Special Agent in Charge